

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,

Debtors.

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FTX TRADING LTD. and MACLAURIN  
INVESTMENTS LTD.,

Plaintiffs,

-against-

LOREM IPSUM UG, PATRICK GRUHN,  
ROBIN MATZKE, and BRANDON WILLIAMS,

Defendants.

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Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Adv. Pro. No. 23-50437 (JTD)

**MOTION TO DISMISS COMPLAINT BY DEFENDANTS  
PATRICK GRUHN, ROBIN MATZKE, AND LOREM IPSUM, UG**

Defendants Patrick Gruhn, Robin Matzke, and Lorem Ipsum, UG (collectively, “**LI Defendants**”) file this motion (this “**Motion**”) requesting that this Court: (a) dismiss the entirety of the Complaint [Adv. Pro. No. 1] (“**Complaint**”) of plaintiffs FTX Trading Ltd. and Maclaurin Investments Ltd. (then known as Alameda Ventures Ltd.), pursuant to Rules 12(b)(1) and (6) of the Federal Rules of Civil Procedure Rule, made applicable in the above-captioned adversary proceeding through Rule 7012(b)(1) and (6) of the Federal Rules of Bankruptcy Procedure. In support of this Motion, the LI Defendants rely upon their accompanying *Brief in Support of Motion to Dismiss Filed by Defendants Patrick Gruhn, Robin Matzke, and Lorem Ipsum, UG* (“**Joint Brief**”), filed contemporaneously herewith.

WHEREFORE, for the reasons set forth in the Joint Brief, the LI Defendants respectfully request that this Court issue an order granting their Motion and dismissing the Complaint in its

entirety with prejudice and granting the Defendants such further relief as this Court may deem just and appropriate. A proposed form of order granting the Motion is attached hereto as **Exhibit A**.

Respectfully submitted,

Dated: October 27, 2023  
Wilmington, Delaware

/s/ Laura Davis Jones

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